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Attorneys for Defendant,
THE WOLF FIRM, A Law Corporation, erroneously sues as THE WOLF LAW
FIRM, A Law Corporation

**UNITED STATES DISTRICT OF CALIFORNIA
SOUTHERN DISTRICT OF CALIFORNIA**

VICTORIA A. AMELINA, an
individual; and A.A.; D.S and B.S.,
each individuals and minors by and
through their Gaurdian Ad Litem,
Victoria A. Amelina

Plaintiffs,

vs.

MANUFACTURES AND TRADERS
TRUST COMPANY aka M&T BANK;
SAFEGUARD PROPERTIES, LLC.;
and THE WOLF LAW FIRM, A Law
Corporation.

Defendants.

Case No.: 3:14-CV-1906-WQH-NLS

**NOTICE OF JOINDER AND
JOINDER OF DEFENDANT THE
WOLF FIRM TO DEFENDANT
MANUFACTURERS AND TRADERS
TRUST COMPANY'S OPPOSITION
TO PLAINTIFFS' MOTION FOR
CLARIFICATION OF COURT'S
ORDER DATED MARCH 13, 2015 RE
DEFENDANTS' MOTIONS TO
DISMISS UNDER FRCP RULE
12(b)(6)**

Date: April 20, 2015
Time: N.A
Dept: 14B

**NO ORAL ARGUMENT UNLESS
REQUESTED BY THE COURT**

**TO THE HONORABLE COURT, ALL PARTIES AND THEIR
RESPECTIVE ATTORNEYS OF RECORD HEREIN:**

PLEASE TAKE NOTICE THAT Defendant, THE WOLF FIRM, A Law
Corporation hereby joins the Opposition filed by Defendant, MANUFACTURES
AND TRADERS TRUST COMPANY aka M&T BANK, in response to Plaintiff's

1 MOTION FOR CLARIFICATION OF COURT'S ORDER DATED MARCH 13,
2 2015 RE DEFENDANTS' MOTIONS TO DISMISS UNDER FRCP RULE
3 12(b)(6) for the reasons set forth in Defendant's Opposition, Plaintiff's Motion
4 should be denied, or alternatively, the Court should modify its order to state
5 specifically that the action is dismissed with prejudice.

6
7 Date: April 3, 2015

THE WOLF FIRM, A Law Corporation

8
9 /s/ Abe G. Salen

10 Abe G. Salen, Esq.

11 Attorneys for Defendant,

12 The WOLF FIRM, A Law Corporation
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CERTIFICATE OF SERVICE

I am over the age of eighteen years and not a party to nor interested in the within action. My business address is 2955 Main Street, Second Floor, Irvine, California 92614.

A true and correct copy of the foregoing document(s), entitled:
NOTICE OF JOINDER AND JOINDER OF DEFENDANT THE WOLF FIRM TO DEFENDANT MANUFACTURERS AND TRADERS TRUST COMPANY'S OPPOSITION TO PLAINTIFFS' MOTION FOR CLARIFICATION OF COURT'S ORDER DATED MARCH 13, 2015 RE DEFENDANTS' MOTIONS TO DISMISS UNDER FRCP RULE 12(b)(6)
will be served or was served (a) on the judge in chambers in the form and manner required by Local Rule ("LR") 5.4.

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders, the foregoing documents will be served by the Court via NEF and hyperlink to the document. On April 3, 2015, I checked the CM/ECF docket for this matter and determined that the following persons on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated on the attached service list.
2. **SERVED BY UNITED STATES MAIL:** On April 3, 2015, I served the following persons and/or entities at the last known address in this case by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid and addressed as follows.
3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state the method for each person or entity served): Pursuant to F.R.Civ. P. 5 and/or controlling local rules, on April 3, 2015, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the Judge here constitutes a declaration that personal service on overnight mail to, the judge will be completed no late than by 12:00 p.m. (Noon) the following business day. Service information continued on attached service list.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on April 3, 2015, at Irvine, CA.



Gaston Felton

SERVICE LIST

Case No. 14CV1906-WQH-NLS

I. SERVED ELECTRONICALLY VIA NEF

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II. SERVED ELECTRONICALLY VIA NEF

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III. SERVED ELECTRONICALLY VIA NEF

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[Attorneys for Defendant M&T Bank]

IV. SERVED VIA OVERNIGHT MAIL

Honorable Judge William Q. Hayes
United States District Court Southern District
Courtroom 14B (14th Floor- Annex)
Suite 1480
333 West Broadway
San Diego, CA 92101